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UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

HARRY E. WILLIAMS JR.,
Plaintiff

: CIVIL ACTION NO.: 1:CV-01-0877

v.

PENNSYLVANIA TURNPIKE COMMISSION,
Defendants

:
:
:
:
:

J. Kambo

FILED
HARRISBURG, PA

SEP 17 2002

MARY E. D'ANDREA, CLERK
Per [Signature]
Deputy Clerk

MOTION FOR ENLARGEMENT OF TIME

AND NOW, comes Plaintiff, through his attorney Andrew J. Ostrowski, Esquire, and in support of his Motion for Enlargement of Time, aver as follows:

1. Defendant filed a Motion for Summary Judgment on August 30, 2002, making Plaintiff's response thereto due on or about September 17, 2002.
2. Plaintiff's Counsel has been tied up in attending proceedings and meeting significant deadlines in several other cases, and has a pre-planned trip scheduled for September 18-22 and, given the extent of the effort necessary to fully and completely respond to Defendant's Motion in this case, additional time will be needed so as to provide Plaintiff with his right to have an adequate opportunity to respond.
3. Under the circumstances, Plaintiff submits that cause exists for granting an enlargement of time, until September 24, 2002 within which to respond to Defendant's Motion for Summary Judgment.

WHEREFORE, Plaintiff respectfully requests that this Court enter an appropriate order granting an enlargement, until September 24, 2002, within which to respond to Defendant's Motion for Summary Judgment.

Respectfully Submitted,

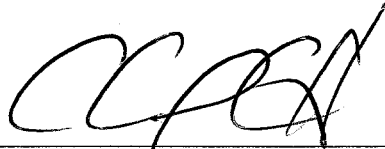
A handwritten signature in black ink, appearing to read 'A. Ostrowski', written over a horizontal line.

Andrew J. Ostrowski, Esquire
I.D. No. 66420
4311 North Sixth Street
Harrisburg, PA 17110
(717) 221-9500
Attorney for Plaintiff

Dated: September 16, 2002

CERTIFICATE OF CONCURRENCE

I, Andrew J. Ostrowski, certify that Counsel for Defendant concurs in Plaintiff's
Motion for Enlargement of Time.

A handwritten signature in black ink, appearing to read 'A. Ostrowski', is written over a horizontal line.


Andrew J. Ostrowski, Esquire
I.D. No. 66420
4311 North Sixth Street
Harrisburg, PA 17110
(717) 221-9500
Attorney for Plaintiff

Dated: September 16, 2002

CERTIFICATE OF SERVICE

I, Andrew J. Ostrowski, Esquire, hereby certify that I have served a true and correct copy of the foregoing document by depositing the same in the U.S. Mail, first class, postage prepaid, addressed as follows:

John C. Romeo, Esquire
Fox, Rothschild, O'Brien & Frankel
2000 Market Street, Tenth Floor
Philadelphia, PA 19103-2706

By 
Andrew J. Ostrowski, Esquire

Dated: September 17, 2002

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

HARRY E. WILLIAMS JR.,
Plaintiff

: CIVIL ACTION NO.: 1:CV-01-0877

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v.

PENNSYLVANIA TURNPIKE COMMISSION,
Defendants

ORDER

AND NOW, this _____ day of September, 2002, upon consideration of Plaintiff's Motion for an Enlargement of Time, it is hereby ORDERED, that the Motion is granted and that Plaintiff's response to Defendant's Motion for Summary Judgment shall be filed by September 24, 2002.

BY THE COURT:

Sylvia H. Rambo
United States District Judge